

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DEBORAH S. SKEANS, Executrix of the ESTATE
OF FRANK E. PAVLIS,

Plaintiff,

v.

KEY COMMERCIAL FINANCE, LLC, KEY
COMMERCIAL FINANCE PROPERTIES, LLC,
EQUITY PROS, LLC, and MOBILE AGENCY,
LLC,

Defendants.

C.A. No. 1:18-cv-01516-CFC

JUSTIN BILLINGSLEY and KEY COMMERCIAL
FINANCE, LLC,

Third-Party Plaintiffs,

v.

DEBORAH S. SKEANS and DARBIN SKEANS,

Third-Party Defendants.

**DEFENDANTS' MOTION FOR TELECONFERENCE
TO RESOLVE DISCOVERY DISPUTE**

Defendants Key Commercial Finance, LLC, Key Commercial Finance Properties, LLC, Equity Pros, LLC, and Mobil Agency, LLC (together, "Defendants") respectfully move this Court to schedule a teleconference to address outstanding discovery disputes relating to Plaintiff Deborah Skeans' refusal to produce certain responsive documents.

Plaintiff confirmed the existence of the documents at issue during a deposition of Plaintiff on April 29, 2020. The following Defendants' counsel sought to schedule a meet and confer, but Plaintiff's counsel was unable to meet and confer before the Court-ordered close of discovery on April 30, 2020:

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With Copy To:

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Mobil Agency, LLC*

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*Attorneys for Plaintiff Deborah S. Skeans,
Executrix to Estate of Frank Pavlis*

Counsel for Defendants are available for a teleconference on the following dates:

May 6, 2020

May 8, 2020

May 11, 2020

Dated: April 30, 2020

Respectfully submitted,

/s/ Theodore A. Kittila

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